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June 19, 2024

Via ECF

The Honorable Valerie Figueredo
United States Magistrate Judge
United States District Court
Southern District of New York
500 Pearl Street, Room 1660
New York, New York 10007

Re: *Shellyne Rodriguez v. The City of New York et al.* (21-cv-10815)(PKC)(VF)

Your Honor:

I am a Senior Counsel in the Office of Muriel Goode-Trufant, Acting Corporation Counsel of the City of New York, and serve as counsel to the defendants in the above-referenced matter. Defendants write to request a 30-day extension of time to produce the academy transcripts for the defendant officers and the roll call from the precinct where the defendant officers were assigned on June 4, 2020. The current deadline to produce these documents is June 21, 2024. See Dkt. No. 90. Plaintiff has consented to the extension.

On March 20, 2024, the Court held a court conference regarding plaintiff's letter application to compel responses from defendants. See Transcript of Court Conference at Dkt. No. 91. During the conference, the Court ruled on particular responses that defendants provided to plaintiff's discovery requests. Two of those requests concerned the defendant officers' Academy Transcripts and the roll call from the precinct where the defendant officers were assigned on June 4, 2020. At the conference, defendants agreed to produce the Academy Transcripts for the defendant officers and agreed to confirm whether the roll call was produced during the Consolidated Protest Cases. Tr. at 19:8 – 12; 66:12 – 15. The defendants are still working on locating these documents. Defendants, however, anticipate amending their responses and producing documents on or before June 21 as to the Court's directives on the other discovery issues that were addressed during the court conference.

As for the roll call and academy transcripts, defendants require an extension in order to complete the production of these documents, which includes locating, reviewing, redacting (where appropriate) and processing them for production. Defendants attempted to confirm that these documents were produced in the Consolidated Protest Cases; however, the process of searching

for and locating these documents was time consuming. Defendants elected to produce them instead.

For the foregoing reasons, defendants respectfully request the Court grant a 30-day extension for the defendants to produce the academy transcripts for the defendant officers and the roll call from the precinct where the defendant officers were assigned on June 4, 2020.

Thank you for your time and attention to this matter.

Respectfully submitted,

Peter Scutero /s

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Special Federal Litigation Division

cc: All Counsel